



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

APR 11 2016

CERTIFIED MAIL 7015 1730 0001 8044 2951
RETURN RECEIPT REQUESTED

Mr. Drew Griffin
Manager, City of Florence
324 West Evans Street
Florence, South Carolina 29501-3456

Re: Gravity Sewer Mains Preventative Maintenance Program
Town of Timmonsville and City of Florence Consent Decree
Civil Action No. 4:13-cv-01522-RBH

Dear Mr. Griffin:

The U.S. Environmental Protection Agency Region 4 and the South Carolina Department of Health and Environmental Control (SC DHEC) have reviewed the Gravity Sewer Mains Preventative Maintenance Program (GSM-PMP) submitted by the City of Florence (the City) on November 24, 2015, pursuant to Paragraph 58(c) of the referenced Consent Decree (CD). The EPA, after consultation with SC DHEC, is disapproving this submittal today, pursuant to Subparagraph 43(d) of the CD, based on the enclosed comments.

The City needs to correct the deficiencies identified in the comments and resubmit the GSM-PMP to the EPA and SC DHEC within 45 calendar days. The EPA, in consultation with SC DHEC, will respond to the resubmission either with an approval or with actions pursuant to Paragraph 47 of the CD. If you have any questions, then please contact Mr. David Phillips at (404) 562-9773 or via email at: phillips.david@epa.gov.

Sincerely,

A handwritten signature in blue ink, which appears to read "Rd FH H for", is written over the typed name.

Maurice L. Horsey, IV, Chief
Municipal and Industrial Enforcement Section
Water Programs Enforcement Branch

Enclosure

cc: See Attached Mailing List

Mailing List:

Chief, Environmental Enforcement Section
U.S. Department of Justice

Office of Water Legal Support
U.S. Environmental Protection Agency, Region 4

Ms. Elizabeth A. Dieck
South Carolina Department of Health and Environmental Control

Mr. David Wilson
South Carolina Department of Health and Environmental Control

Mayor
Town of Timmonsville

Mr. Eleazer Carter, Esq.
The Carter Law Firm

Mr. James W. Peterson, Jr., Esq.
Clarke, Johnson, Peterson & McLean P.A.

EPA Region 4 and SC DHEC Comments (March 31, 2016)

Gravity Sewer Mains Preventative Maintenance Program (transmitted November 24, 2015)

Civil Action No. 4:13-CV-01522-RBH

1. Paragraph 58(c) of the Consent Decree: *The objective of this program shall be to establish a prioritized strategy for the routine inspection of the entire Gravity Sewer Main System.... appropriate inspection and cleaning rates for the Gravity Sewer Main System which are consistent with the EPA's guidance, "Collection Systems O&M Fact Sheet: Sewer Cleaning and Inspection....*

Page (iv) of the submittal, last paragraph, indicates the City aims to complete a Sanitary Sewer Evaluation Survey (SSES) of the entire Timmons ville wastewater collection system prior to developing and completing a rehabilitation plan, and afterward commence implementing the preventative maintenance program (PMP).

To meet the objective, the EPA expects the PMP to contain frequencies that are implemented both concurrent with, and post-completion of, the SSES and rehabilitation activity in any given area of the Timmons ville system. As indicated on page 2-5, when it occurs, the SSES activity can count toward the scheduled cleaning frequency. However, this activity should not be in lieu of immediate application of an appropriate routine inspection and maintenance schedule by the City. The City should specify a higher frequency of routine cleaning necessary for age-appropriate areas until the SSES can be performed in those areas and a rating provided to apply the Table 2-1 frequencies.

It is also possible that the necessary frequencies of preventative maintenance established in the PMP may decline over time as the system is rehabilitated. This appears to be reflected in the post-rehabilitation frequencies in Table 3-2. However, scheduling and performing age-appropriate routine preventative maintenance on the system should not be wholly ignored until initial SSES and/or rehabilitation is completed.

The City must resubmit the PMP with the required prioritized strategy for routine inspection, and associated inspection and cleaning frequencies, in order to meet the expectations of the Consent Decree.

2. Section 1. Manhole Inspections: *Each manhole will be located using a global positioning system (GPS).*

The included manhole inspection report form and accompanying instructions lack an item to record the GPS coordinates of record or to make any corrective notes.

3. Section 2. Preventative and Predictive Line Cleaning

- a. Page 2-2. Compliance/Grease Traps. Paragraph 58(c) of the Consent Decree requires: *written standard operating procedures which will act to prevent the sources of blockages in Gravity Sewer Lines.* The submittal lacks written standard operating procedures for the grease program. While a general overview of procedures is supplied, this does not meet the expectation for standard operating procedures. The details supplied are not sufficient to independently operate the program.

- b. Page 2-2. Compliance/Grease Traps: *There is one employee dedicated to this activity.* It is unclear if this employee is only for the Timmons ville portion of the system or for the entire system.
- c. Page 2-2. Wastewater Treatment: *Three operators are specifically assigned to this task to ensure efficient and continual operation of all sanitary sewer lift stations.* It is unclear if this manpower level is referring to all stations in the Timmons ville portion of the system or to all stations in the system. Also relevant would be including the actual number of stations overseen per individual.
- d. Page 2-2. *These three work groups work collaboratively together as one unit in the following manner. Lift station operators notify the Collection Operations group and Compliance group when there is visible grease build-up in the wet well of the lift station....*

This section describes a reactive program and not a preventative or predictive program as it is entitled. A preventative or predictive program is not contingent on identifying a problem once it has occurred. The City needs to develop and submit a preventive program.

- 4. Section 3. Closed Circuit Television, page 3-4. The long-term inspection/cleaning schedule proposed after rehabilitation is in Table 3-2. This outlay is not consistent with the EPA guidance referenced in the Consent Decree. Inspecting sewers every decade is not an appropriate frequency, even for newer sewers.
- 5. Section 4. Root Control Program, page 4-1. A root control program was deemed unnecessary due to the lack of main line root problems experienced by the Town of Timmons ville, and that a line with continuous problems with roots would be replaced.

It has been established that the Town's maintenance activity and records were less than adequate, so it seems a risk to based preventative maintenance needs on that information. The City needs to document root problems found/addressed during the routine preventative inspections and reactive service calls. Also, the criteria for what the City deems "continuous" and requiring line replacement, needs specification.

- 6. Section 58(c)(ii) of the Consent Decree requires that each sub-program (inspection, cleaning, root control) include: (a) detailed guidance for personnel responsible for the activities, (b) a calendar and map of the schedules and associated areas of the system, (c) forms, (d) routes, (e) reporting procedures, (f) safety procedures, and (g) procedures for maintaining and trending the data. The submittal does not fully meet all of these requirements, in part due to the issues discussed above.